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July 29, 1999

Mr. K. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

**IN RE: Crockett Telephone Company, Inc.; Peoples Telephone Company;
West Tennessee Telephone Company, Inc. (comprising the "TEC Companies")
IntraLATA Dialing Parity Implementation Plan
Docket 99-00294**

Dear Mr. Waddell:

Enclosed please find an original and thirteen (13) copies of the IntraLATA Toll Dialing Parity Implementation Plan for Crockett Telephone Company Inc.; Peoples Telephone Company; and West Tennessee Telephone Company, Inc. (comprising the "TEC Companies").

Also enclosed is an original and thirteen (13) copies of the Dialing Parity Cost Recovery Rate Element cost study data. This revised data is being submitted as required under the above mentioned project.

Thank you for bringing this to the attention of the Tennessee Regulatory Authority for approval.

Sincerely,

Lera Roark
Vice President

LOR/sp

Enclosures: IntraLATA Toll Dialing Parity Implementation Plan
Dialing Parity Cost Recovery Rate Element Cost Study

T E L E P H O N E
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INTRALATA TOLL DIALING PARITY PLAN CROCKETT TELEPHONE COMPANY, INC.

The following *IntraLATA Toll Dialing Parity Plan* has been developed consistent with provisions of the Federal Communications Commission's (FCC's) Second Report and Order, FCC 96-333, adopted August 8, 1996. This plan is being submitted to the Tennessee Regulatory Authority (TRA) for its information and approval. Crockett Telephone Company, Inc., Alamo Exchange 901-696, Maury City Exchange 901-656 and Friendship Exchange 901-677, will associate with LATA 468 for the purposes of providing toll dialing parity as it currently does for its provision of interLATA equal access.

1. **Toll Dialing Parity Implementation Schedule**

Pending TRA approval as outlined above, Crockett Telephone Company, Inc. (hereinafter referred to as "Company") will implement intraLATA 1+ equal access, as set forth below in Section 6, beginning 30 days after the TRA approval date. (Implementation start date)

2. **IntraLATA Presubscription Methodology**

The *Full 2-PIC* (Presubscribed Interexchange Carrier) option shall be the methodology used to provide customers with a full range of choices in selecting their intraLATA 1+/0+ toll provider. Under this option, the customer may select a toll/interexchange carrier for its intrastate intraLATA calling and a separate toll/interexchange carrier for its interLATA calls.

3. **Calls Subject to IntraLATA Toll Dialing Parity**

Intrastate intraLATA 1+ and 0+ toll calls originating in an exchange shall be subject to the intraLATA toll dialing parity provisions.

4. **Customers Eligible For IntraLATA Toll Dialing Parity**

All end user customers subscribing to the Company's local exchange service offerings shall be eligible for intraLATA dialing parity.

5. **IntraLATA Toll Carrier At Outset**

Until a customer affirmatively chooses another intrastate intraLATA toll/interexchange carrier, intraLATA toll calls, which are not prefaced with 10XXX/101XXXX, shall be carried by the Company's designated toll/interexchange carrier. There will be no balloting of customers.

6. **Implementation Schedule**

The Company will implement toll dialing parity, subject to TRA's approval of this intraLATA Toll Dialing Parity Plan, on or before September 22, 1999,¹ as outlined below:

The steps are as follows:

- a. Provide notification, a minimum of two months prior to the conversion to intraLATA 1+ toll dialing parity, to all those toll/interexchange carriers which presently offer Feature Group D service in the applicable end offices.

¹ The September 22, 1999, date noted herein was approved by the Tennessee Regulatory Authority ("TRA") on June 8, 1999, under Docket 99-00294 – "Petition for Modification".

- b. Notify subscribers of the availability of intraLATA 1+ toll dialing parity not less than thirty (30) days prior to conversion. (Implementation end date) The generic customer notification is attached.
- c. Initially assign all existing subscribers to the designated toll/interexchange carrier, subject to receipt of a request to the contrary from a customer, or a "Letter of Agency" (LOA) from an authorized toll/interexchange carrier. An IXC may not forward LOAs to the Company earlier than thirty (30) days prior to the customer conversion date. Letter of Agency contacts shall only be honored from those toll/interexchange carriers first executing an LOA Agreement, which, among other things, acknowledges the toll/interexchange carrier's obligation to follow federally prescribed rules (including, without limitation, "anti-slamming" rules, as described in Section 9 below).
- d. Customers that are provided local service subsequent to the implementation of intraLATA 1+ toll dialing parity, will be able to select an intraLATA toll/interexchange carrier using the same procedure currently followed to select an interLATA interexchange carrier. If the customer does not select an intraLATA carrier, the customer will be assigned a "NO" PIC status, until such time as the customer makes a selection for an IntraLATA carrier.

7. **Cost Recovery**

Dialing parity costs include costs related to customer education, incremental presubscription costs—including the costs incurred during the 90 days immediately following the date of implementation, in which customers may make one PIC change without charge—and the initial incremental expenditures for hardware and software related directly to the provision of dialing parity, which would not be required to upgrade the switching capabilities of the office involved absent the provision of dialing parity. Additionally, related administrative costs will be included.

The Company shall file, a discrete "Dialing Parity Cost Recovery" (DPCR) tariff rate element with the TRA, which reflects the estimated costs as outlined above, a proposed cost recovery period of one year (consistent with FCC DA-1541, adopted September 28, 1988, and applicable to all NECA pool members), and estimated demand units based upon the total 1998 calendar year originating Intrastate access minutes. The DPCR rate element shall be assessed upon all intrastate interexchange carriers. Cost and demand data in support of the rate element will be submitted to the TRA at the time of the filing. A true up of cost recovery is contemplated at the end of the one-year period, and any recovery deficiency or overage will be adjusted in a bill to toll providers in proportion to their relative share of cost recovery for the period.

8. **Charges for Selection/Assignment of Carrier & Unauthorized PIC Change**

The Company shall not impose any charge on the customer for the customer's **initial** selection of a carrier other than the designated toll/interexchange carrier, to carry the customer's intraLATA toll calls. This shall also apply in the 90-day period immediately following the implementation date. Charges will apply after the customer's initial selection or after the 90-day period immediately following the implementation end date.

Charges imposed upon a customer for changing the customer's Presubscribed carrier for its intraLATA toll calls, and charges applicable to toll providers related to Unauthorized PIC Changes, are to be those set forth in the Company's tariff on file with the TRA, and in effect at the time. (It is contemplated that such PIC charge will be \$5.00 for the intraLATA PIC change, and an Unauthorized PIC Change charge of \$35.65, applicable to both residence and business lines, as provided for in NECA Tariff FCC No. 5.) It should be understood that the Unauthorized PIC Change Charge is intended as an assessment to toll providers, not to customers.

9. **Anti-Slamming**

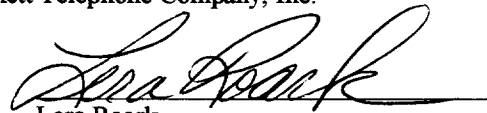
IntraLATA toll dialing parity shall be subject to the same anti-slamming and dispute resolution procedures that the FCC has set forth for interLATA presubscription. IntraLATA toll dialing parity shall also be subject to the provisions of Section 258 of the Federal Communications Act of 1934, as provided for by the Telecommunications Act of 1996, and any regulations adopted by the FCC or the TRA addressing unauthorized changes in customer carrier selections.

10. Crockett Telephone Company, Inc. will comply with all rules of the FCC and TRA for Dialing Parity.

Respectfully submitted,

Crockett Telephone Company, Inc.

By:



Lera Roark

Crockett Telephone Company, Inc.

1309 Louisville Avenue

Monroe LA 71201

Tel. (318) 322-0015

Fax (318) 323-2164

Dialing Parity Cost Recovery RateREC'D TN
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Company Name: Crockett Telephone Co., Inc.

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1. EWSD Switch Costs	\$20,000
2. Estimated Expenses of Conversion*	\$21,924
3. Total Dialing Parity Costs (1 + 2)	\$41,924
4. Originating Intrastate Access Minutes	6,752,542
5. Dialing Parity Cost Recovery Rate (3 / 4)	\$0.0062

* Includes administrative costs such as carrier notification, customer notification, postage and mailing, and database changes. Also included are costs associated with response to customer questions and central office programming by line.

**INTRALATA TOLL DIALING PARITY PLAN
PEOPLES TELEPHONE COMPANY**

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The following *IntraLATA Toll Dialing Parity Plan* has been developed consistent with provisions of the Federal Communications Commission's (FCC's) Second Report and Order, FCC 96-333, adopted August 8, 1996. This plan is being submitted to the Tennessee Regulatory Authority (TRA) for its information and approval. Peoples Telephone Company, Erin exchange 931-289 and Tennessee Ridge exchange 931-721 will associate with LATA 470; and Henry exchange 901-243 will associate with LATA 468 for the purposes of providing toll dialing parity as it currently does for its provision of interLATA equal access.

1. **Toll Dialing Parity Implementation Schedule**

Pending TRA approval as outlined above, Peoples Telephone Company, (hereinafter referred to as "Company") will implement intraLATA 1+ equal access, as set forth below in Section 6, beginning 30 days after the TRA approval date. (Implementation start date)

2. **IntraLATA Presubscription Methodology**

The *Full 2-PIC* (Presubscribed Interexchange Carrier) option shall be the methodology used to provide customers with a full range of choices in selecting their intraLATA 1+/0+ toll provider. Under this option, the customer may select a toll/interexchange carrier for its intrastate intraLATA calling and a separate toll/interexchange carrier for its interLATA calls.

3. **Calls Subject to IntraLATA Toll Dialing Parity**

Intrastate intraLATA 1+ and 0+ toll calls originating in an exchange shall be subject to the intraLATA toll dialing parity provisions.

4. **Customers Eligible For IntraLATA Toll Dialing Parity**

All end user customers subscribing to the Company's local exchange service offerings shall be eligible for intraLATA dialing parity.

5. **IntraLATA Toll Carrier At Outset**

Until a customer affirmatively chooses another intrastate intraLATA toll/interexchange carrier, intraLATA toll calls, which are not prefaced with 10XXX/101XXXX, shall be carried by the Company's designated toll/interexchange carrier. There will be no balloting of customers.

6. **Implementation Schedule**

The Company will implement toll dialing parity, subject to TRA's approval of this intraLATA Toll Dialing Parity Plan, on or before September 22, 1999,¹ as outlined below:

The steps are as follows:

- a. Provide notification, a minimum of two months prior to the conversion to intraLATA 1+ toll dialing parity, to all those toll/interexchange carriers which presently offer Feature Group D service in the applicable end offices.
- b. Notify subscribers of the availability of intraLATA 1+ toll dialing parity not less than thirty (30) days prior to conversion. (Implementation end date) The generic customer notification is attached.

¹ The September 22, 1999, date noted herein was approved by the Tennessee Regulatory Authority ("TRA") on June 8, 1999, under Docket 99-00294 - "Petition for Modification".

- c. Initially assign all existing subscribers to the designated toll/interexchange carrier, subject to receipt of a request to the contrary from a customer, or a "Letter of Agency" (LOA) from an authorized toll/interexchange carrier. An IXC may not forward LOAs to the Company earlier than thirty (30) days prior to the customer conversion date. Letter of Agency contacts shall only be honored from those toll/interexchange carriers first executing an LOA Agreement, which, among other things, acknowledges the toll/interexchange carrier's obligation to follow federally prescribed rules (including, without limitation, "anti-slamming" rules, as described in Section 9 below).
- d. Customers that are provided local service subsequent to the implementation of intraLATA 1+ toll dialing parity, will be able to select an intraLATA toll/interexchange carrier using the same procedure currently followed to select an interLATA interexchange carrier. If the customer does not select an intraLATA carrier, the customer will be assigned a "NO" PIC status, until such time as the customer makes a selection for an IntraLATA carrier.

7. **Cost Recovery**

Dialing parity costs include costs related to customer education, incremental presubscription costs—including the costs incurred during the 90 days immediately following the date of implementation, in which customers may make one PIC change without charge—and the initial incremental expenditures for hardware and software related directly to the provision of dialing parity, which would not be required to upgrade the switching capabilities of the office involved absent the provision of dialing parity. Additionally, related administrative costs will be included.

The Company shall file, a discrete "Dialing Parity Cost Recovery" (DPCR) tariff rate element with the TRA, which reflects the estimated costs as outlined above, a proposed cost recovery period of one year (consistent with FCC DA-1541, adopted September 28, 1988, and applicable to all NECA pool members), and estimated demand units based upon the total 1998 calendar year originating Intrastate access minutes. The DPCR rate element shall be assessed upon all intrastate interexchange carriers. Cost and demand data in support of the rate element will be submitted to the TRA at the time of the filing. A true up of cost recovery is contemplated at the end of the one-year period, and any recovery deficiency or overage will be adjusted in a bill to toll providers in proportion to their relative share of cost recovery for the period.

8. **Charges for Selection/Assignment of Carrier & Unauthorized PIC Change**

The Company shall not impose any charge on the customer for the customer's initial selection of a carrier other than the designated toll/interexchange carrier, to carry the customer's intraLATA toll calls. This shall also apply in the 90-day period immediately following the implementation date. Charges will apply after the customer's initial selection or after the 90-day period immediately following the implementation end date.

Charges imposed upon a customer for changing the customer's Presubscribed carrier for its intraLATA toll calls, and charges applicable to toll providers related to Unauthorized PIC Changes, are to be those set forth in the Company's tariff on file with the TRA, and in effect at the time. (It is contemplated that such PIC charge will be \$5.00 for the intraLATA PIC change, and an Unauthorized PIC Change charge of \$35.65, applicable to both residence and business lines, as provided for in NECA Tariff FCC No. 5.) It should be understood that the Unauthorized PIC Change Charge is intended as an assessment to toll providers, not to customers.

9. **Anti-Slamming**

IntraLATA toll dialing parity shall be subject to the same anti-slamming and dispute resolution procedures that the FCC has set forth for interLATA presubscription. IntraLATA toll dialing parity shall also be subject to the provisions of Section 258 of the Federal Communications Act of 1934, as provided for by the Telecommunications Act of 1996, and any regulations adopted by the FCC or the TRA addressing unauthorized changes in customer carrier selections.

10. **Peoples Telephone Company will comply with all rules of the FCC and TRA for Dialing Parity.**

Respectfully submitted,

Peoples Telephone Company

By:


Lera Roark

Peoples Telephone Company

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Dialing Parity Cost Recovery Rate

Company Name: Peoples Telephone Co., Inc.

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1. EWSD Switch Costs	\$20,000
2. Estimated Expenses of Conversion*	\$23,296
3. Total Dialing Parity Costs (1 + 2)	\$43,296
4. Originating Intrastate Access Minutes	7,080,716
5. Dialing Parity Cost Recovery Rate (3 / 4)	\$0.0061

* Includes administrative costs such as carrier notification, customer notification, postage and mailing, and database changes. Also included are costs associated with response to customer questions and central office programming by line.

**INTRALATA TOLL DIALING PARITY PLAN
WEST TENNESSEE TELEPHONE COMPANY, INC.**

The following *IntraLATA Toll Dialing Parity Plan* has been developed consistent with provisions of the Federal Communications Commission's (FCC's) Second Report and Order, FCC 96-333, adopted August 8, 1996. This plan is being submitted to the Tennessee Regulatory Authority (TRA) for its information and approval. West Tennessee Telephone Company, Inc., Bradford Exchange 901-742, Atwood Exchange 901-662, Trezevant Exchange 901-669 and Rutherford Exchange 901-665, will associate with LATA 468 for the purposes of providing toll dialing parity as it currently does for its provision of interLATA equal access.

1. **Toll Dialing Parity Implementation Schedule**

Pending TRA approval as outlined above, West Tennessee Telephone Company, Inc., (hereinafter referred to as "Company") will implement intraLATA 1+ equal access, as set forth below in Section 6, beginning 30 days after the TRA approval date. (Implementation start date)

2. **IntraLATA Presubscription Methodology**

The *Full 2-PIC* (Presubscribed Interexchange Carrier) option shall be the methodology used to provide customers with a full range of choices in selecting their intraLATA 1+/0+ toll provider. Under this option, the customer may select a toll/interexchange carrier for its intrastate intraLATA calling and a separate toll/interexchange carrier for its interLATA calls.

3. **Calls Subject to IntraLATA Toll Dialing Parity**

Intrastate intraLATA 1+ and 0+ toll calls originating in an exchange shall be subject to the intraLATA toll dialing parity provisions.

4. **Customers Eligible For IntraLATA Toll Dialing Parity**

All end user customers subscribing to the Company's local exchange service offerings shall be eligible for intraLATA dialing parity.

5. **IntraLATA Toll Carrier At Outset**

Until a customer affirmatively chooses another intrastate intraLATA toll/interexchange carrier, intraLATA toll calls, which are not prefaced with 10XXX/101XXXX, shall be carried by the Company's designated toll/interexchange carrier. There will be no balloting of customers.

6. **Implementation Schedule**

The Company will implement toll dialing parity, subject to TRA's approval of this intraLATA Toll Dialing Parity Plan, on or before September 22, 1999,¹ as outlined below:

The steps are as follows:

- a. Provide notification, a minimum of two months prior to the conversion to intraLATA 1+ toll dialing parity, to all those toll/interexchange carriers which presently offer Feature Group D service in the applicable end offices.

¹ The September 22, 1999, date noted herein was approved by the Tennessee Regulatory Authority ("TRA") on June 8, 1999, under Docket 99-00294 – "Petition for Modification".

- b. Notify subscribers of the availability of intraLATA 1+ toll dialing parity not less than thirty (30) days prior to conversion. (Implementation end date) The generic customer notification is attached.
- c. Initially assign all existing subscribers to the designated toll/interexchange carrier, subject to receipt of a request to the contrary from a customer, or a "Letter of Agency" (LOA) from an authorized toll/interexchange carrier. An IXC may not forward LOAs to the Company earlier than thirty (30) days prior to the customer conversion date. Letter of Agency contacts shall only be honored from those toll/interexchange carriers first executing an LOA Agreement, which, among other things, acknowledges the toll/interexchange carrier's obligation to follow federally prescribed rules (including, without limitation, "anti-slamming" rules, as described in Section 9 below).
- d. Customers that are provided local service subsequent to the implementation of intraLATA 1+ toll dialing parity, will be able to select an intraLATA toll/interexchange carrier using the same procedure currently followed to select an interLATA interexchange carrier. If the customer does not select an intraLATA carrier, the customer will be assigned a "NO" PIC status, until such time as the customer makes a selection for an IntraLATA carrier.

7. **Cost Recovery**

Dialing parity costs include costs related to customer education, incremental presubscription costs—including the costs incurred during the 90 days immediately following the date of implementation, in which customers may make one PIC change without charge—and the initial incremental expenditures for hardware and software related directly to the provision of dialing parity, which would not be required to upgrade the switching capabilities of the office involved absent the provision of dialing parity. Additionally, related administrative costs will be included.

The Company shall file, a discrete "Dialing Parity Cost Recovery" (DPCR) tariff rate element with the TRA, which reflects the estimated costs as outlined above, a proposed cost recovery period of one year (consistent with FCC DA-1541, adopted September 28, 1988, and applicable to all NECA pool members), and estimated demand units based upon the total 1998 calendar year originating Intrastate access minutes. The DPCR rate element shall be assessed upon all intrastate interexchange carriers. Cost and demand data in support of the rate element will be submitted to the TRA at the time of the filing. A true up of cost recovery is contemplated at the end of the one-year period, and any recovery deficiency or overage will be adjusted in a bill to toll providers in proportion to their relative share of cost recovery for the period.

8. **Charges for Selection/Assignment of Carrier & Unauthorized PIC Change**

The Company shall not impose any charge on the customer for the customer's initial selection of a carrier other than the designated toll/interexchange carrier, to carry the customer's intraLATA toll calls. This shall also apply in the 90-day period immediately following the implementation date. Charges will apply after the customer's initial selection or after the 90-day period immediately following the implementation end date.

Charges imposed upon a customer for changing the customer's Presubscribed carrier for its intraLATA toll calls, and charges applicable to toll providers related to Unauthorized PIC Changes, are to be those set forth in the Company's tariff on file with the TRA, and in effect at the time. (It is contemplated that such PIC charge will be \$5.00 for the intraLATA PIC change, and an Unauthorized PIC Change charge of \$35.65, applicable to both residence and business lines, as provided for in NECA Tariff FCC No. 5.) It should be understood that the Unauthorized PIC Change Charge is intended as an assessment to toll providers, not to customers.


9. **Anti-Slamming**

IntraLATA toll dialing parity shall be subject to the same anti-slamming and dispute resolution procedures that the FCC has set forth for interLATA presubscription. IntraLATA toll dialing parity shall also be subject to the provisions of Section 258 of the Federal Communications Act of 1934, as provided for by the Telecommunications Act of 1996, and any regulations adopted by the FCC or the TRA addressing unauthorized changes in customer carrier selections.

10. West Tennessee Telephone Company, Inc. will comply with all rules of the FCC and TRA for Dialing Parity.

Respectfully submitted,

West Tennessee Telephone Company, Inc.

By: 
Lera Roark
West Tennessee Telephone Company, Inc.
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Monroe LA 71201
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Fax (318) 323-2164

Dialing Parity Cost Recovery Rate

Company Name: West Tennessee Telephone Co., Inc.

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1. EWSD Switch Costs	\$20,000
2. Estimated Expenses of Conversion*	\$23,084
3. Total Dialing Parity Costs (1 + 2)	\$43,084
4. Originating Intrastate Access Minutes	5,361,697
5. Dialing Parity Cost Recovery Rate (3 / 4)	\$0.0080

* Includes administrative costs such as carrier notification, customer notification, postage and mailing, and database changes. Also included are costs associated with response to customer questions and central office programming by line.